

#1

Lindsey Springer

From: "Derrington, David (USAOKN)" <David.Derrington@usdoj.gov>
To: <Lindsey@mindspring.com>
Sent: Thursday, October 08, 2009 5:21 PM
Attach: KTMKUL.pdf
Subject: FW: OV4C-Itinerary Only For SPRINGER LINDSEY KENT 10/15/09

Exh #1

-----Original Message-----

From: Derrington, David (USAOKN)
Sent: Thursday, October 08, 2009 5:19 PM
To: 'Linsdey@mindspring.com'
Subject: FW: OV4C-Itinerary Only For SPRINGER LINDSEY KENT 10/15/09

Disregard this one, you will have another one coming soon.

-----Original Message-----

From: Notification II [mailto:CWTAQUAMail14@carlsonwagonlit.com]
Sent: Thursday, October 08, 2009 5:15 PM
To: LINDSEY@MINDSPRING.COM; Derrington, David (USAOKN)
Subject: OV4C-Itinerary Only For SPRINGER LINDSEY KENT 10/15/09

<<KTMKUL.pdf>>

This is an automated email notification. Please do not respond to this email address.

****Did you know we can also book your hotels and rental cars? ****

#3

Lindsey Springer

From: "Derrington, David (USAOKN)" <David.Derrington@usdoj.gov>
To: <Lindsey@mindspring.com>
Sent: Tuesday, October 13, 2009 7:02 AM
Attach: KTMKUL.pdf
Subject: FW: OV4C-Itinerary Only For SPRINGER LINDSEY KENT 10/15/09

FYI - is was told that you should be at the gate an hour early to confirm your seat thanks.

Exh #3

David H. Derrington
Administrative Services Specialist
United States Attorney's Office
110 West 7th Street, Suite 300
Tulsa, Oklahoma 74119
P: (918) 382-2731
F: (918) 560-7949
David.Derrington@usdoj.gov

-----Original Message-----

From: Notification II [<mailto:CWTAQUAMail14@carlsonwagonlit.com>]
Sent: Thursday, October 08, 2009 5:22 PM
To: LINDSEY@MINDSPRING.COM; Derrington, David (USAOKN)
Subject: OV4C-Itinerary Only For SPRINGER LINDSEY KENT 10/15/09

<<KTMKUL.pdf>>

This is an automated email notification. Please do not respond to this email address.

****Did you know we can also book your hotels and rental cars? ****

Lindsey Springer

From: "Derrington, David (USAOKN)" <David.Derrington@usdoj.gov>
To: "Lindsey Springer" <lindsey@mindspring.com>
Cc: "O'Reilly, Charles A. (TAX)" <Charles.A.O'Reilly@usdoj.gov>; "Snoke, Ken (USAOKN)" <Ken.Snoke@usdoj.gov>
Sent: Tuesday, October 13, 2009 10:31 AM
Subject: RE: OV4C-Itinerary Only For SPRINGER LINDSEY KENT 10/15/09

Exh #4

Hi Lindsey,

I'm sorry but I have everything scheduled for airfare and hotel stay. If you have any questions, please let us know.

David H. Derrington
Administrative Services Specialist
United States Attorney's Office
110 West 7th Street, Suite 300
Tulsa, Oklahoma 74119
P: (918) 382-2731
F: (918) 560-7949
David.Derrington@usdoj.gov

-----Original Message-----

From: Lindsey Springer [mailto:lindsey@mindspring.com]
Sent: Tuesday, October 13, 2009 10:22 AM
To: Derrington, David (USAOKN)
Subject: Re: OV4C-Itinerary Only For SPRINGER LINDSEY KENT 10/15/09

David, can you change my return flight to Saturday evening instead of Friday evening on the last flight out to tulsa through Dallas or wherever? I am at 955-8225. thanks, Lindsey Springer

----- Original Message -----

From: "Derrington, David (USAOKN)" <David.Derrington@usdoj.gov>
To: <Lindsey@mindspring.com>
Sent: Tuesday, October 13, 2009 7:02 AM
Subject: FW: OV4C-Itinerary Only For SPRINGER LINDSEY KENT 10/15/09

FYI - is was told that you should be at the gate an hour early to confirm your seat thanks.

David H. Derrington
Administrative Services Specialist
United States Attorney's Office
110 West 7th Street, Suite 300



#5

Lindsey Springer

From: "O'Reilly, Charles A. (TAX)" <Charles.A.O'Reilly@usdoj.gov>
To: "Lindsey Springer" <lindsey@mindspring.com>; <law@trsvlaw.com>
Cc: "Snoke, Ken (USAOKN)" <Ken.Snoke@usdoj.gov>; "Derrington, David (USAOKN)" <David.Derrington@usdoj.gov>; "Hall, Kathie (USAOKN)" <Kathie.Hall@usdoj.gov>
Sent: Tuesday, October 13, 2009 2:24 PM
Subject: RE: OV4C-Itinerary Only For SPRINGER LINDSEY KENT 10/15/09

Ex. 5

Mr. Springer:

We tried both your home telephone number (which was busy) and the cell phone number (479) 420-9246 (which did not work). The United States' responsibility is to make travel arrangements that allow you to attend the deposition. We have done so.

As noticed in the United States filing last week the deposition will commence at 9:00 a.m. Friday, October 16, at Ms. Wiggins' home, which is approximately forty minutes from the airport and hotel. Ms. Wiggins' address, which was previously provided to Mr. Robert Burton, is 1052 East 131st Street, Los Angeles, California. The United States has also arranged for Mr. Robert Burton to be reimbursed for a rental car to be used to transport you, Mr. Stilley and Mr. Williams (if he attends) to the deposition and back to the airport. Your flight on Friday leaves at 4:45 p.m., allowing at least six hours for the deposition.

The United States is not in a position to adjust your travel arrangements. If you wish to adjust your travel for whatever reason, that is your responsibility, not that of the United States.

Sincerely,

Charles A. O'Reilly
Special Assistant U.S. Attorney
Northern District of California

-----Original Message-----

From: Derrington, David (USAOKN)
Sent: Tuesday, October 13, 2009 11:32 AM
To: Lindsey Springer
Cc: O'Reilly, Charles A. (TAX); Snoke, Ken (USAOKN)
Subject: RE: OV4C-Itinerary Only For SPRINGER LINDSEY KENT 10/15/09

Hi Lindsey,

I'm sorry but I have everything scheduled for airfare and hotel stay. If you have any questions, please let us know.

David H. Derrington

10/14/2009

Lindsey Springer

From: "O'Reilly, Charles A. (TAX)" <Charles.A.O'Reilly@usdoj.gov>
To: "Lindsey Springer" <lindsey@mindspring.com>; <law@trsvlaw.com>
Cc: "Snoke, Ken (USAOKN)" <Ken.Snoke@usdoj.gov>; "Derrington, David (USAOKN)" <David.Derrington@usdoj.gov>; "Hall, Kathie (USAOKN)" <Kathie.Hall@usdoj.gov>; "Oscar Stilley" <oscar@oscarstilley.com>; <RobtBurton@aol.com>
Sent: Tuesday, October 13, 2009 3:09 PM
Subject: RE: OV4C-Itinerary Only For SPRINGER LINDSEY KENT 10/15/09

Mr. Springer:

Per our telephone conversation earlier this afternoon, I have confirmed that Mr. Derrington can make adjustments to your travel schedule as late as 2:00 p.m. (Los Angeles time). Therefore, consistent with our telephonic discussion, we will leave the travel arrangements as they are. If it is determined that the deposition will extend past 2:00 p.m., you will contact Mr. Derrington prior to that time. Mr. Derrington will then adjust the travel arrangements accordingly. This includes, if necessary, one additional night's stay at the hotel and a Saturday morning airline flight for your return to Tulsa, Oklahoma.

This being said, the cross-examination of Ms. Wiggins should not exceed the amount of time spent on her direct examination.

Sincerely,

Charles A. O'Reilly
Special Assistant U.S. Attorney
Northern District of California

-----Original Message-----

From: O'Reilly, Charles A. (TAX)
Sent: Tuesday, October 13, 2009 3:25 PM
To: Lindsey Springer; Robert Scott Williams (law@trsvlaw.com)
Cc: Snoke, Ken (USAOKN); Derrington, David (USAOKN); Hall, Kathie (USAOKN)
Subject: RE: OV4C-Itinerary Only For SPRINGER LINDSEY KENT 10/15/09

Mr. Springer:

We tried both your home telephone number (which was busy) and the cell phone number (479) 420-9246 (which did not work). The United States' responsibility is to make travel arrangements that allow you to attend the deposition. We have done so.

As noticed in the United States filing last week the deposition will commence at 9:00 a.m. Friday, October 16, at Ms. Wiggins' home, which is approximately forty minutes from the airport and hotel. Ms. Wiggins' address, which was previously provided to Mr. Robert Burton, is 1052 East 131st Street, Los Angeles, California. The United States has also

10/14/2009

RE: OV4C-Itinerary Only For SPRINGER LINDSEY KENT
10/15/09

From: lindsey@mindspring.com
To: "O'Reilly, Charles A. (TAX)"
Subject: RE: OV4C-Itinerary Only For SPRINGER LINDSEY KENT 10/15/09
Date: Oct 13, 2009 5:28 PM

Exh 7
FR #7
1 of 2

Dear Mr. O'Rielly and Snoke - I will not agree with your 2:00 p.m. proposal. First, you are the ones who are asking me to take important pre-trial time to take this deposition. I am having to go double overtime prior to the 14th including getting ready for a deposition I was not needed to take until after the 26th. You are asking me to stop Thursday at noon and take the chance of having to worry about return on Friday while staying focused at a trial deposition of Ms. Wiggins. I agreed to do the depo on Friday for one because you said you could not do it next week as Mr. Snoke said "that is too close to trial."

Though that is not my problem I have accomidated you and now learn you are trying to save \$100 "taxpayer's money" in an additional hotel room for Friday night which the Oklahoma "taxpayers" should have thought about before they decided to take a deposition on Friday Morning in California (everyone who has ever traveled this route knows the time issue is more than difficult). As I said earlier Apprx. 9:00 A.M.to 1:00 P.M. is not enough time under the circumstances you painted to obtain this Rule 15 deposition. You said Mr. Snoke intends on asking questions for about 2 hours. You also suggest I am not allowed to cross examine more than that amount of time.

I do not agree with your position on time as you have the testimony of Ms. Wiggins from her Grand Jury testimony and the questions you ask her on Friday for me to cross examine. On top of all that you also have Mr. Stilley who would apparently have some say on questions he might ask that could affect his interest in this case. Then you have the possibility of conjestive heart failure might give rise to Ms. Wiggins needing period breaks and heaven only knows when those will be or for how long. Your scheduled time is quite frankly unacceptable.

I am not willing to be at the mercy and last minute of someone 2 hours behind California time, on a Friday afternoon, controlling my next two to three days that I do not know and that does not care about my well being (in your office). If any indication can be drawn from past performance and this scheduling issue I certainly believe the person you assigned would be less than assertive in any "last minute" changes. I request you schedule my flight out on Saturday Afternoon (around 4:00 P.M. is fine) or the last flight out that returns me to Tulsa Saturday and if I cannot get that from you then I will Petition the Court for the same relief Tomorrow. You can tell the Judge you are arguing over \$100.00

room (Friday Night) vs. Springer's 6th Amendment Right to thoroughly examine Ms. Wiggins one time since you apparently have had unfettered access to her for years.

20F2

If it can be changed then it needs changing now. You say it can be changed by 2:00 P.M. on Friday then lets change it now.

As to your suggestion that "I have been manipulating the system for two decades and you are not going to allow me to do it here" therein lies the reason why we have Judges. I do not know why you are choosing to battle me on this issue but as my defacto "travel agent" either I must have you direct David (or whoever) to change my flight or I will get the Court involved.

By the way, one of the stand by attorneys is scheduled to go out on Thursday and return on Sunday. So much for your manipulation thoery!

If the Court orders me to pay for Friday Night stay (\$ 100) then I guess I will have to pay that. The Court ordered you to pay the expenses for your Rule 15 deposition. It is my conclusion this includes reasonable expenses. It is my opinion it is unreasonable for you to have me scheduled out on Friday at 4:00 P.M. to avoid a \$ 100.00 room Friday night.

Setting the second night expense aside, I think the Court would like to know why you will not allow me to change the flight to a reasonable time on Saturday. Please include that in your explanation of denying me this change so I can include it in my prospective motion.

I will file my emergency motion in the morning if I have not heard from someone that either I can change my flight out on my own or has communicated with me directly regarding changing to a Saturday afternoon flight out.

Lindsey Springer 10.13.09

-----Original Message-----

>From: "O'Reilly, Charles A. (TAX)" <Charles.A.O'Reilly@usdoj.gov>

>Sent: Oct 13, 2009 3:09 PM

>To: Lindsey Springer <lindsey@mindspring.com>, law@trsvlaw.com

>Cc: "Snoke, Ken (USAOKN)" <Ken.Snoke@usdoj.gov>, "Derrington, David (USAOKN)" <David.Derrington@usdoj.gov>, "Hall, Kathie (USAOKN)" <Kathie.Hall@usdoj.gov>, Oscar Stilley <oscar@oscarstilley.com>, RobtBurton@aol.com

Lindsey Springer

From: "O'Reilly, Charles A. (TAX)" <Charles.A.O'Reilly@usdoj.gov>
To: "Lindsey Springer" <lindsey@mindspring.com>; <law@trsvlaw.com>
Cc: "Snoke, Ken (USAOKN)" <Ken.Snoke@usdoj.gov>; "Derrington, David (USAOKN)" <David.Derrington@usdoj.gov>; "Hall, Kathie (USAOKN)" <Kathie.Hall@usdoj.gov>; "Oscar Stilley" <oscar@oscarstilley.com>; <RobtBurton@aol.com>
Sent: Tuesday, October 13, 2009 5:11 PM
Subject: RE: OV4C-Itinerary Only For SPRINGER LINDSEY KENT 10/15/09

Mr. Springer:

Exh 8

In our last telephone call, you requested that the United States change your flight to Saturday morning. This request came despite our previous conversation (see email below) in which you agreed that so long as the travel arrangements could be adjusted if needed, no change needed to be made at this time. As an alternative to the United States agreeing to change your travel arrangements, you requested that the United States give you complete control over your travel arrangements.

That is not possible, nor have you articulated a reasoned basis for being treated differently than the other participants in this matter. The United States representatives are flying out Thursday and returning Friday, as are Mr. Stilley and Mr. Williams (if he attends). Mr. Burton requested a different schedule prior to the United States setting up the travel arrangements and was accomodated.

As I stated repeatedly on the telephone, the purpose of this travel is for the taking of the Rule 15 deposition: nothing more. Your request to be treated differently is unwarranted. Should the deposition extend later than 2:00 p.m., you can and should contact Mr. Derrington who will make any changes necessary to the travel arrangements. There should be no need for the deposition to last past noon, however. AUSA Snoke anticipates his direct examination in the deposition will last less then one hour. Even if your cross-examination lasts twice as long, that is only three hours.

If you perceive that these arrangements are unreasonable, you are free to petition the Court as you indicated was your intention.

Sincerely,

Charles A. O'Reilly
Special Assistant U.S. Attorney
Northern District of Oklahoma

-----Original Message-----

From: O'Reilly, Charles A. (TAX)
Sent: Tuesday, October 13, 2009 4:10 PM
To: 'Lindsey Springer'; 'Robert Scott Williams (law@trsvlaw.com)'
Cc: Snoke, Ken (USAOKN); Derrington, David (USAOKN); 'Hall, Kathie